

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

CHAD PELISHEK,

Plaintiff,

-vs-

Case No. 2:23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

Examination of VERONICA VALDEZ taken at
the instance of the Plaintiff, under and pursuant to
the Federal Rules of Civil Procedure, before Dawn M.
Lahti, a Certified Realtime Reporter, Registered
Professional Reporter and Notary Public in and for
the State of Wisconsin, at Holiday Inn Express, 350
E. Seven Hills Road, Port Washington, Wisconsin, on
July 12, 2024, commencing at 10:00 a.m. and
concluding at 12:56 p.m.

<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 DEMASTER LAW LLC, by</p> <p>4 MS. JENNIFER DeMASTER</p> <p>5 361 Falls Road, Suite 610</p> <p>6 Grafton, Wisconsin 53024</p> <p>7 appeared on behalf of the Plaintiff.</p> <p>8</p> <p>9 MWH LAW, by</p> <p>10 MR. WARREN BULIOX</p> <p>11 735 North Water Street, Suite 610</p> <p>12 Milwaukee, Wisconsin 53202</p> <p>13 appeared on behalf of the Defendants.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 TRANSCRIPT OF PROCEEDINGS</p> <p>2 VERONICA VALDEZ, called as a witness</p> <p>3 herein, having been first duly sworn on oath,</p> <p>4 was examined and testified as follows:</p> <p>5 MS. DeMASTER: My name is Jennifer</p> <p>6 DeMaster. I represent the plaintiff in this</p> <p>7 case, Chad Pelishek.</p> <p>8 MR. BULIOX: I'm Warren Buliox. I</p> <p>9 represent the defendant in this case.</p> <p>10 EXAMINATION</p> <p>11 BY MS. DeMASTER:</p> <p>12 Q So please state and spell your first and last</p> <p>13 name for the record.</p> <p>14 A Veronica Valdez, V-E-R-O-N-I-C-A, V-A-L-D-E-Z.</p> <p>15 Q Have you ever done a deposition?</p> <p>16 A Never.</p> <p>17 Q This is your first time. It's fairly common.</p> <p>18 If you have any questions, I'll just go through</p> <p>19 a few rules. Instead of saying yes or no --</p> <p>20 instead of nodding or saying uh-huh, uh-uh, say</p> <p>21 clear answers, yes, no. We'll try to speak</p> <p>22 more clearly just so everybody can hear it.</p> <p>23 If there's a question that I ask</p> <p>24 that you don't understand, please feel free to</p> <p>25 interrupt me. I won't be offended. You can</p>
<p style="text-align: right;">Page 3</p> <p>1 * * * * *</p> <p>2 I N D E X</p> <p>3 Examination: Page</p> <p>4 BY MS. DeMASTER 4</p> <p>5 BY MR. BULIOX 113</p> <p>6 BY MS. DeMASTER 123</p> <p>7 BY MR. BULIOX 126</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12 Exhibits Identified: Page</p> <p>13 Exhibit 11 Email, 11/14/22 38</p> <p>14 Exhibit 12 Text Message with Amanda 65</p> <p>15 Salazar and Emily Rendall-Araujo</p> <p>16 Exhibit 13 Email, 2/7/23 72</p> <p>17 Exhibit 14 Conversation Between Roberta 100</p> <p>18 Filicy-Peneski and Todd Wolf</p> <p>19 Exhibit 15 WHBL Article Misleads Readers 104</p> <p>20</p> <p>21 Disposition of Original Exhibits:</p> <p>22 Attached to Original Transcript.</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 just ask me to rephrase or clarify that. If</p> <p>2 you don't understand the question, you can do</p> <p>3 that.</p> <p>4 If there's something I ask that</p> <p>5 you don't recall and then later I ask something</p> <p>6 and you remember it or you recall it again,</p> <p>7 feel free to just jump right in. Again, I</p> <p>8 won't be offended, hey, you know what I</p> <p>9 actually do remember something about this and</p> <p>10 you can do that.</p> <p>11 So those are kind of the basic</p> <p>12 rules. If you have any questions, let me know.</p> <p>13 I'll answer them as best I can just about how</p> <p>14 this process goes, but it's fairly common</p> <p>15 there.</p> <p>16 What is your current job title?</p> <p>17 A I am the mayor's assistant and communication</p> <p>18 specialist for the City of Sheboygan.</p> <p>19 Q And so you are currently employed by the City</p> <p>20 of Sheboygan?</p> <p>21 A I am. In the evenings I manage a restaurant</p> <p>22 called Prohibition Bistro.</p> <p>23 Q What do they serve?</p> <p>24 A It's located right on the riverfront in</p> <p>25 Sheboygan, and they serve neapolitan pizza and</p>

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1 of his employment, his demeanor, there was just
2 a lot of character change there.
3 Q And you're talking about Chad?
4 A Yeah.
5 Q Was it hard to see?
6 A It was extremely -- I mean, this is -- I'm
7 still in the first couple months of my
8 employment in onboarding when I'm kind of
9 seeing all of this chaos kind of ravel and
10 unfold.
11 And I'm wondering why maybe --
12 we hire consultant firms all the time. Why
13 isn't somebody coming in here to try to provide
14 direction on how to handle situations like this
15 because in the past even consulting firms that
16 I worked for has assisted and facilitated with
17 incidents in providing recommendations at
18 least.
19 So there was a lot of ways to
20 ask for help and to be able to get that. I
21 just wish the city would have acted much faster
22 on the importance of the incident investigation
23 and what they can do when you wait.
24 Q Did you see Chad on a regular basis?
25 A Yeah, I worked with him on a very regular

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1 basis. He actually facilitated and assisted in
2 a lot of my communications training. Any time
3 I had an open issue, I could go to him for
4 help.
5 I always have people calling or
6 requesting an update on projects, and he knew a
7 lot of history on the City of Sheboygan, so he
8 was actually one of the first calls I'm going
9 to make aside from Carrie Arenz, a former city
10 administrator's assistant, yeah.
11 Q Personally to you -- did Chad ever personally
12 to you or talking about something else use a
13 racial slur?
14 A I am trying to -- he definitely explained what
15 happened. There was an instance where we were
16 together in Germany where we heard about the
17 Alderperson Roberta Filicky-Peneski using the
18 racial slur, and we're listening to the
19 recording.
20 I never heard him use the entire
21 racial slur, but he did admit to what happened
22 in the management meeting --
23 Q Okay.
24 A -- after he was asked what was said in the
25 neighborhood meeting.

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1 Q And did he ever say anything that personally
2 offended you about perhaps people of color or
3 other ethnicities?
4 A I don't think that -- I was born and raised in
5 Sheboygan my entire life, so it's unfortunate
6 to experience racism, but it has happened in
7 our community.
8 I do believe there are
9 situations that people may not be aware of
10 culturally, so what offended me was the use of
11 a racial slur.
12 So I am a person of color. I
13 will take offense to that. I did make that
14 known to Chad. I think he did feel -- I know
15 he felt uncomfortable with the city at large
16 knowing he used that racial slur because I
17 don't think that he intended it in a way
18 directly to somebody using it -- the term
19 himself. I think he was repeating what he
20 heard in his neighborhood meeting. I do
21 believe it should have been censored.
22 So the fact that he just was
23 asked what was said, I think that he did not
24 rethink it at all to -- I don't know why he did
25 not, but I don't think that he felt he could

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1 share what was used in a neighborhood
2 association meeting that's supported by the
3 city and created by the city.
4 Q Did you ever communicate that you wanted to see
5 Chad fired?
6 A I told Todd explicitly and Carrie that in my
7 experience, and I've had this happen at Nemak
8 before, where somebody used a racial slur. And
9 typically what happens is a person is placed on
10 administrative leave while that incident is
11 investigated fully.
12 Why? Because it provides a
13 barrier for this person to get out of work and
14 to understand what was said and for the City of
15 Sheboygan to take the proper steps to address
16 that situation.
17 And there were people on the
18 phone call when the word was used. And I think
19 it was extremely important that they should
20 have investigated the situation because what it
21 did seem like was that you can use a racial
22 slur as a City of Sheboygan employee, and there
23 are no repercussions at one of the highest
24 levels as a department manager.
25 Q And you stated a couple times that he was asked

<p style="text-align: right;">Page 58</p> <p>1 to repeat what was said at the meeting.</p> <p>2 A From my understanding of the situation when I</p> <p>3 was told what happened and I was not in that</p> <p>4 room so I can't, right, verbatim repeat, but I</p> <p>5 was told multiple times that he was asked what</p> <p>6 did the person say.</p> <p>7 So from what I heard, he came to</p> <p>8 that meeting to say that we have some racism</p> <p>9 and some major issues in our neighborhood</p> <p>10 association meetings that were essentially</p> <p>11 created by former mayors. So it's supported</p> <p>12 directly by our office and facilitated by his</p> <p>13 employees. So his employee Janet brought that</p> <p>14 to him, and that's where he felt the need to</p> <p>15 share that in that meeting.</p> <p>16 From what I heard, Emily asked</p> <p>17 what is being said? And he's like, well, and</p> <p>18 then stated that somebody said what are we</p> <p>19 going to do about all these Ns moving to our</p> <p>20 neighborhood. So instead of censoring it, he</p> <p>21 used the term.</p> <p>22 Q And you stated that you talked to Todd and</p> <p>23 Carrie about something happening there.</p> <p>24 Were you also upset mainly only</p> <p>25 at Chad, or were you upset at that situation</p>	<p style="text-align: right;">Page 60</p> <p>1 So I definitely don't think</p> <p>2 that -- I'm upset that it was handled -- that</p> <p>3 it was not handled appropriately in my eyes as</p> <p>4 an employee.</p> <p>5 Q As far as Chad, do you feel that it was</p> <p>6 appropriate for that information to be made</p> <p>7 public about what he said?</p> <p>8 A Do I feel if it was fair?</p> <p>9 Q Appropriate.</p> <p>10 A I feel that a municipality in the City of</p> <p>11 Sheboygan should have very clear expectations</p> <p>12 of their employees and should have a very clear</p> <p>13 outline of rules and responsibilities of our</p> <p>14 employees. It's unfortunate that maybe that</p> <p>15 was not clear in some sort of way that would</p> <p>16 make somebody feel okay to use a racial slur.</p> <p>17 So was he -- I wonder what was</p> <p>18 in his handbook when he signed to be an</p> <p>19 employee or what you agree to. I think I know</p> <p>20 what's expected of a department director, and</p> <p>21 he fell below that with utilizing that racial</p> <p>22 slur.</p> <p>23 What was the question again so I</p> <p>24 can answer that?</p> <p>25 Q That's fine.</p>
<p style="text-align: right;">Page 59</p> <p>1 and how that was -- like with him being -- with</p> <p>2 Emily asking him and then that happening and</p> <p>3 how there needed to be something to make sure</p> <p>4 that this didn't happen?</p> <p>5 A Well, so I had and worked with a couple</p> <p>6 personal situations, right? I've gone to</p> <p>7 volunteer at nursing homes where I'm just</p> <p>8 assisting, right, just spending time playing</p> <p>9 chess with individuals. And they ask my race</p> <p>10 or ethnicity, and they've used a racial slur.</p> <p>11 I've taken calls at the City of</p> <p>12 Sheboygan where people have used -- called to</p> <p>13 complain and have used racial slurs. I have</p> <p>14 worked in previous places of employment where</p> <p>15 people have used racial slurs at the Chamber of</p> <p>16 Commerce. One of their employees used a racial</p> <p>17 slur, and it was handled -- so different people</p> <p>18 handle situations differently.</p> <p>19 In my experience especially with</p> <p>20 respect to just -- for people, it's just</p> <p>21 there's -- and human resources general respect</p> <p>22 for others. That's discrimination, so it's</p> <p>23 racial -- it's hate. I don't know. It's</p> <p>24 terrible, but there's a way to handle that.</p> <p>25 There's a method of investigation.</p>	<p style="text-align: right;">Page 61</p> <p>1 A What was the question? Do I think it was fair</p> <p>2 if the information release?</p> <p>3 Q It was made public. The information that he's</p> <p>4 a -- the narrative that he's a racist.</p> <p>5 Do you feel that was fair to</p> <p>6 Chad?</p> <p>7 A I don't know what the rules and regulations are</p> <p>8 on management meetings or what the level of</p> <p>9 privacy is or what the policy is or what the</p> <p>10 understanding is.</p> <p>11 What I do know from that</p> <p>12 situation was that people had left that meeting</p> <p>13 and had began to get on their devices and</p> <p>14 express how they felt about what they had just</p> <p>15 heard. And that's where conversations now got</p> <p>16 into Facebook chats, large public forums and</p> <p>17 groups.</p> <p>18 I was trying to think personally</p> <p>19 if I ever -- would I ever want that to be</p> <p>20 known. I just know that I wouldn't in any</p> <p>21 capacity. Yeah -- so.</p> <p>22 Q In your opinion, do you think Chad made a</p> <p>23 mistake by responding to Emily that way, or was</p> <p>24 this intentional because he wanted to offend</p> <p>25 people?</p>

<p style="text-align: right;">Page 62</p> <p>1 A I think he definitely made a mistake. Given</p> <p>2 Chad's personality type, he is not a very --</p> <p>3 he's not a social butterfly. He is not</p> <p>4 somebody who is -- I've never knew him or saw</p> <p>5 in his character to be somebody who would act</p> <p>6 with malicious intent towards somebody. I've</p> <p>7 never seen him raise his voice. He's extremely</p> <p>8 soft spoken.</p> <p>9 So, no, I do not think that he</p> <p>10 intended to hurt anybody in that meeting.</p> <p>11 Q And did Mayor Sorenson ever tell you about --</p> <p>12 your testimony -- I'll start that over.</p> <p>13 Your testimony was that people</p> <p>14 had gone on their devices after that meeting.</p> <p>15 Did Mayor Sorenson tell you</p> <p>16 about anybody at that meeting who had talked</p> <p>17 about Chad --</p> <p>18 A He did not. At the time that that occurred,</p> <p>19 the office was being shared by Emily</p> <p>20 Rendall-Araujo and Josh Drossel, her wellness</p> <p>21 coordinator.</p> <p>22 So when -- immediately following</p> <p>23 that meeting, she came into the office right by</p> <p>24 my desk and was like you wouldn't believe what</p> <p>25 just happened. At the time she was already on</p>	<p style="text-align: right;">Page 64</p> <p>1 mayor at that time?</p> <p>2 A I think so, yes.</p> <p>3 Q Do they still have a close relationship?</p> <p>4 A Yes.</p> <p>5 Q Have you ever been a part of their</p> <p>6 communications during that time?</p> <p>7 A Yes. Emily felt extremely emotionally</p> <p>8 overwhelmed just from what I could see from</p> <p>9 that. Her husband is Peruvian. She has, I</p> <p>10 think, a tremendous amount of love for people</p> <p>11 from what I see. And especially working at</p> <p>12 Uptown Social with the people that she does,</p> <p>13 there's a certain level of patience that you</p> <p>14 have to have.</p> <p>15 The people she told -- one</p> <p>16 included Amanda Salazar, and she has a very</p> <p>17 diverse friend group, so I know she took</p> <p>18 offense to it.</p> <p>19 Q Did you tell Emily that you wanted Todd and</p> <p>20 Chad both fired?</p> <p>21 A I don't think I said that about Todd. I think</p> <p>22 what I said -- if I can recollect what I said</p> <p>23 was that in my experience, typically people are</p> <p>24 placed on administrative leave while the</p> <p>25 situation is investigated fully.</p>
<p style="text-align: right;">Page 63</p> <p>1 her phone. So then she began to share that</p> <p>2 situation. And she was like, I can't believe</p> <p>3 that, I'm talking to my friend group about it.</p> <p>4 So she had let me know that she had.</p> <p>5 As things had gone on, she had</p> <p>6 said that somebody she told from her friend</p> <p>7 group had told and went to -- or shared this</p> <p>8 information on a Facebook chat group, and it's</p> <p>9 a progressive women's group.</p> <p>10 I am not a member of the group</p> <p>11 so I can't see the conversations, but I know</p> <p>12 there were screenshots shared of the</p> <p>13 conversation and the anger that was now</p> <p>14 starting to develop for Chad Pelishek, and</p> <p>15 people were starting there to demand he be</p> <p>16 fired and things like that.</p> <p>17 Q You said Emily talked to you. Emily was in the</p> <p>18 office at the time is what you stated. She was</p> <p>19 working in the office?</p> <p>20 A She had a shared office while Uptown Social was</p> <p>21 being built, so Emily did share an office and a</p> <p>22 conference room off to the left side of the</p> <p>23 room, and she used that with her wellness</p> <p>24 coordinator.</p> <p>25 Q Does she have a close relationship with the</p>	<p style="text-align: right;">Page 65</p> <p>1 The results to that typically is</p> <p>2 people lose their job for using racial slurs.</p> <p>3 It's not accepted. There's no way to explain</p> <p>4 that, and we work with members of the public.</p> <p>5 Since then I know we've had</p> <p>6 developers tell us that they stopped, working</p> <p>7 with us after the racial slur which was very</p> <p>8 hurtful to hear that people were cutting off</p> <p>9 their relationship with the City of Sheboygan</p> <p>10 because of the reputation that was in the</p> <p>11 Sheboygan Press or the reputation that the</p> <p>12 Sheboygan Press was creating.</p> <p>13 Q Thank you.</p> <p>14 (Exhibit 12 was marked for</p> <p>15 identification.)</p> <p>16 MS. DeMASTER: Would you please mark</p> <p>17 this as Plaintiff's Exhibit 12.</p> <p>18 BY MS. DeMASTER:</p> <p>19 Q I am handing you a text message. This is a</p> <p>20 public record between Amanda Salazar and Emily</p> <p>21 Rendall-Araujo.</p> <p>22 A Do you know what the state of this message is?</p> <p>23 Q I believe you can see it on the very bottom.</p> <p>24 It's kind of cut off.</p> <p>25 A Oh, October 14th.</p>

<p style="text-align: right;">Page 66</p> <p>1 Q Or maybe the day before that.</p> <p>2 A Okay.</p> <p>3 Q So here these were provided by Amanda talking</p> <p>4 to Emily. So Emily's are on the left side, and</p> <p>5 Emily is saying here you, Veronica, felt very</p> <p>6 strongly they both need to go.</p> <p>7 Do you know any other Veronica</p> <p>8 that works with Emily?</p> <p>9 A No.</p> <p>10 Q Do you agree or disagree with this statement?</p> <p>11 A If that's her interpretation --</p> <p>12 MR. BULIOX: Just objection as to</p> <p>13 form in the document itself in terms of</p> <p>14 foundation.</p> <p>15 Subject to that, you can go ahead and</p> <p>16 answer.</p> <p>17 THE WITNESS: I'm not sure what her</p> <p>18 feelings or interpretations are, so you'd have</p> <p>19 to ask Emily. But if that's how she perceived</p> <p>20 or she may have perceived something that I said</p> <p>21 in a certain way, but I can only speak on how I</p> <p>22 felt.</p> <p>23 BY MS. DeMASTER:</p> <p>24 Q Is that what you meant -- if she proceeded</p> <p>25 wrongly, that's one thing. Is that what you</p>	<p style="text-align: right;">Page 68</p> <p>1 specialist, what does that refer to?</p> <p>2 A Diversity, equity, inclusion, and belonging is</p> <p>3 what I'm familiar as those -- as that acronym</p> <p>4 is.</p> <p>5 Q Was there ever any training -- any DEI or</p> <p>6 diversity training?</p> <p>7 A In the past or during my time?</p> <p>8 Q During your time.</p> <p>9 A Yes. I worked with the chamber. So they do</p> <p>10 different DEIB trainings. And there was a name</p> <p>11 of a gentleman who's a motivational speaker but</p> <p>12 claimed to be a DEIB professional, and I only</p> <p>13 just questioned just his credentials because</p> <p>14 motivational speaker was always like the big</p> <p>15 thing on there.</p> <p>16 Q Do you remember his name?</p> <p>17 A I'm trying to recall. I can't. Alonzo Kelly,</p> <p>18 that's what it was.</p> <p>19 Q Okay.</p> <p>20 A Todd worked with him in the past. Todd and</p> <p>21 Carrie shared a time they used Alonzo Kelly and</p> <p>22 did trainings at the police department, and</p> <p>23 that's when Todd shared a significant number of</p> <p>24 individuals from DPW police or fire, but they</p> <p>25 sat in the bathroom instead of listening to the</p>
<p style="text-align: right;">Page 67</p> <p>1 meant?</p> <p>2 A I think that what I meant is that the situation</p> <p>3 should have been investigated fully. Chad</p> <p>4 should have been placed on administrative leave</p> <p>5 while it was investigated.</p> <p>6 Q Was the situation ever investigated?</p> <p>7 A I don't know. Why I say that is because I</p> <p>8 don't ever recall, right, filling out an</p> <p>9 employee statement that would have said what</p> <p>10 happened, what did you hear, how did this</p> <p>11 situation transpire.</p> <p>12 I do believe that Carrie and</p> <p>13 Todd worked together based off all of our</p> <p>14 concerns to try to provide direction to Chad</p> <p>15 with an apology email, started to discuss DEIB</p> <p>16 trainings that the city should incorporate,</p> <p>17 right?</p> <p>18 Because if Chad maybe was not</p> <p>19 aware that he should have censored the word,</p> <p>20 that there's something that we can do to</p> <p>21 prevent this from happening, right? So let's</p> <p>22 bring in a DEIB specialist so we can try to</p> <p>23 focus on, right, correcting behavior and --</p> <p>24 yeah, and providing some support.</p> <p>25 Q Just a clarification. When you say a DEIB</p>	<p style="text-align: right;">Page 69</p> <p>1 message.</p> <p>2 So I was really concerned as to</p> <p>3 how we didn't acknowledge that at the time, how</p> <p>4 people were not talked to about that, is that</p> <p>5 in an employee file somewhere. And we're going</p> <p>6 to do the same thing, so I did just question</p> <p>7 that.</p> <p>8 So I can't quite recall when</p> <p>9 exactly the trainings were, but I do believe</p> <p>10 Alonzo Kelly -- I did attend trainings within</p> <p>11 the time with Alonzo Kelly. I can't recall if</p> <p>12 it's from the staff or not. If I have a</p> <p>13 specific date, I can always look back on that</p> <p>14 too.</p> <p>15 Q Do you remember in general what the training</p> <p>16 talked about or -- was it only Alonzo Kelly, or</p> <p>17 was there any other diversity training while</p> <p>18 you were with the City of Sheboygan?</p> <p>19 I believe we had another witness</p> <p>20 testify that there was one held at City Hall</p> <p>21 and one held at UW.</p> <p>22 A Yes.</p> <p>23 Q Did you attend either of those?</p> <p>24 A I'm trying to recall. I had to have attended</p> <p>25 the one at City Hall. I can't recall, though.</p>

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1 like that, or emails, if I had them, but not
 2 that I can -- yeah. If you have something in
 3 mind that you're speaking of, otherwise I just
 4 have a fear of making generalizations or
 5 anything like that.
 6 Q That's fine. This is your recollection.
 7 Generalization is not a lie. You're trying to
 8 remember. That's okay.
 9 A Okay.
 10 Q Don't worry about that.
 11 A Okay.
 12 Q None of this is intentional. You're trying to
 13 remember.
 14 A Yeah.
 15 Q Do you remember what you told Jill Hall --
 16 A I can say right now I honestly don't even
 17 remember anything past like, hey, I'm Jill
 18 Hall. I can't even tell you who she works for.
 19 Q All right.
 20 A I know that sounds awful.
 21 Q Has anyone at the city ever told you to delete
 22 any messages?
 23 A No. To delete any? Anybody at the city told
 24 me to delete any messages?
 25 Q Any text messages.

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1 A Not that I recall.
 2 Q Any group text messages?
 3 A The question is has anybody from the city? I
 4 do not -- I can't remember.
 5 Q You can't remember?
 6 A No. I do know I've had multiple conversations
 7 with people that use encrypted text messaging
 8 apps to talk. I was told if it is a company
 9 phone, if you're doing any company business
 10 where they can be taken from the city or the
 11 city can take or request that from you at any
 12 time. I'm just trying to remember.
 13 I don't remember. If there's a
 14 specific person, situation, time, or place, I
 15 can try to recall.
 16 Q Have you ever been on a group text message
 17 thread with Emily -- that included Emily and
 18 Mayor Sorenson?
 19 A Yes.
 20 Q Who all was on that group text?
 21 A Oh, yes. I think I do recall comments that --
 22 an inappropriate comment that Emily had made,
 23 and she was a little worried about -- yeah.
 24 Q Did she want the message to be deleted?
 25 A I feel it had something to do with Todd and

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1 something offensive towards Todd.
 2 Q She asked you guys to delete that message?
 3 A She may have. I'm not a big deleter of
 4 messages.
 5 Q You never deleted a message?
 6 A I don't think so.
 7 Q Did Emily tell you she ever deleted a text
 8 message about Todd or Chad?
 9 A I can't recall.
 10 Q Did she ever text to you in that group to talk
 11 about Chad?
 12 A I have had conversations with her where she has
 13 shared feelings with Chad about that
 14 conversation.
 15 Q Did she do that over text message?
 16 A She could have. I know that I have had verbal
 17 conversations with her on the phone and in text
 18 messages where the whole -- yep.
 19 Q With a slur and everything?
 20 A Yes.
 21 Q You say Emily did have a text message -- any
 22 text communication that you were included on
 23 about Chad?
 24 A Yeah, she may have.
 25 Q Did you speak with her often?

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1 A No.
 2 Q I want to go back -- fast-forward to Adam
 3 Westbrook -- not Adam Westbrook.
 4 Who was leading the Hall
 5 investigation?
 6 A The attorney's office, right? I'm assuming the
 7 attorney's office.
 8 Q Who were you told?
 9 A Attorney's office.
 10 Q So it wasn't Mayor Sorenson?
 11 A No. It's my understanding that the mayor is
 12 not able to handle personnel issues in his
 13 capacity as mayor. That would be like a city
 14 administrator, interim city admin, NHR,
 15 attorney's office with the direction here that
 16 they're handling HR issues.
 17 Q And was it your understanding the City
 18 Attorney's Office was helping to lead that
 19 investigation?
 20 A Yes.
 21 Q And when did you first hear that the
 22 investigation was concluded, the Hall
 23 investigation?
 24 A I can't even remember.
 25 Q Do you remember there being a written report

<p style="text-align: right;">Page 86</p> <p>1 that was being prepared from that</p> <p>2 investigation?</p> <p>3 A I want to say yes because I can't imagine what</p> <p>4 she would be doing interviews without being</p> <p>5 able to obtain some sort of --</p> <p>6 Q Did you ever hear -- did you ever hear somebody</p> <p>7 say check Adams was helping her with a written</p> <p>8 report?</p> <p>9 A I can't remember, but I guess I can assume that</p> <p>10 they would be working together to put together</p> <p>11 a report or develop findings as an assumption.</p> <p>12 Q Did Adam Westbrook ever -- did you ever talk to</p> <p>13 Adam Westbrook about your concerns with some of</p> <p>14 the community partners given the slur with</p> <p>15 Chad?</p> <p>16 You mentioned -- to provide some</p> <p>17 background, you mentioned before that you were</p> <p>18 concerned of the slur because you were hearing</p> <p>19 from people around the city that they did not</p> <p>20 want to work with Chad --</p> <p>21 A Yes.</p> <p>22 Q -- after hearing about this?</p> <p>23 A Yes.</p> <p>24 Q Kind of walk me through that. What did you</p> <p>25 say? What did you talk about?</p>	<p style="text-align: right;">Page 88</p> <p>1 MS. DeMASTER: I'm sorry about that.</p> <p>2 BY MS. DeMASTER:</p> <p>3 Q To your knowledge, did you know that any alders</p> <p>4 thought that the narrative was false?</p> <p>5 A Yeah -- yes. There were alders that did not</p> <p>6 believe that he was a racist man but was just</p> <p>7 asked to repeat what he had heard, and he did</p> <p>8 just that.</p> <p>9 Q And as you stated that this was a mistake that</p> <p>10 could be corrected; is that correct?</p> <p>11 A What do you mean?</p> <p>12 Q A mistake that could be -- this was a mistake</p> <p>13 and not an intentional pattern of conduct.</p> <p>14 A Yeah. I don't think that he deliberately</p> <p>15 wanted to say a racial slur, right, with intent</p> <p>16 to someone. I think that just as the logical</p> <p>17 thinker that he really is, he just was asked a</p> <p>18 question and answered it without -- I don't</p> <p>19 think that -- I think that -- I don't think</p> <p>20 that he thought that this was going to happen.</p> <p>21 I think he was just sharing with the team the</p> <p>22 level of racism and direct words that are used</p> <p>23 in the meeting.</p> <p>24 Q Thank you. You mentioned before that when Chad</p> <p>25 first brought this up at that management</p>
<p style="text-align: right;">Page 87</p> <p>1 A To Adam Westbrook about my concerns with the</p> <p>2 public?</p> <p>3 Q Um-hum.</p> <p>4 A I can't recall entirely.</p> <p>5 Q Just in general.</p> <p>6 A I'm sure that I just kind of discussed wanting</p> <p>7 to ensure that we're not going to -- from my</p> <p>8 recollection, I do worry about partners and how</p> <p>9 they feel working with the City of Sheboygan,</p> <p>10 so that's -- probably what I said is how is the</p> <p>11 Chamber of Commerce and all their affiliates,</p> <p>12 County Economic Development Corporation, all</p> <p>13 their affiliates. And then Chad, so many</p> <p>14 relationships he's built with so many people,</p> <p>15 is that now going to be strained because of</p> <p>16 this. See him, us, in a different light</p> <p>17 because this right here looks and sounds -- the</p> <p>18 article in the Sheboygan Press looks and sounds</p> <p>19 like he's a racist leader.</p> <p>20 Q Did you think that narrative was false?</p> <p>21 A Yeah.</p> <p>22 Q To your knowledge, did alderpersons know that</p> <p>23 narrative was false? Did Westbrook ever tell</p> <p>24 you that?</p> <p>25 MR. BULIOX: I'm sorry. Compound.</p>	<p style="text-align: right;">Page 89</p> <p>1 meeting, he brought this up on behalf of his</p> <p>2 employee Janet.</p> <p>3 Who were you talking about?</p> <p>4 A Janet Duellman. She is the neighborhood</p> <p>5 association liaison.</p> <p>6 Q And so you stated that Janet had told Chad</p> <p>7 about this?</p> <p>8 A Yes.</p> <p>9 Q And he was raising this to help her; is that</p> <p>10 correct?</p> <p>11 A Yes. He was raising his concern because he</p> <p>12 wanted it to be known that there are members in</p> <p>13 those neighborhood associations that are using</p> <p>14 those racial slurs. These are city sponsored</p> <p>15 and that we need to do something about that.</p> <p>16 So he was raising that to let</p> <p>17 everybody know what is happening in these</p> <p>18 meetings and to do something about it, and he</p> <p>19 was seeking guidance as to what do I do.</p> <p>20 Q Is it fair to say that Janet was reporting a</p> <p>21 racism incident that she went --</p> <p>22 A This started with Janet, yes. Janet reported</p> <p>23 what she heard to Chad from my understanding,</p> <p>24 yes.</p> <p>25 Q And so Chad was raising that to others?</p>

23 (Pages 86 - 89)

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1 A Yes. It is Chad's responsibility as the
 2 department head to share concerns that are
 3 extreme -- that are that extreme to the
 4 management team especially to the mayor as that
 5 is one of his initiatives to have that
 6 neighborhood leadership cabinet.
 7 Q Of course. Did the mayor ever tell you that he
 8 was pleased that Chad raised this issue?
 9 A I know that the mayor was definitely -- I don't
 10 want to say thankful or grateful. He was -- I
 11 think he was -- he wanted to be made aware that
 12 that is occurring in our community because he
 13 would never allow or accept that, so I think he
 14 would be on the same page with Chad as to
 15 wanting to address it.
 16 Q Did the mayor ever say anything to you about
 17 wanting Chad to pay for his mistake in the
 18 community?
 19 A No. Actually, the mayor felt really bad for
 20 him.
 21 Q Did he?
 22 A He did. And he made a personal comment like
 23 hopefully this trip to Germany will help him
 24 get his mind off things. Hopefully this will
 25 be nice for him. But from my experience with

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1 Chad there, he was too overwhelmed with what's
 2 going on back home, the pressures and not
 3 knowing what if my kids are getting out of
 4 school and someone is yelling, your dad is a
 5 racist, and his wife is a physician in the
 6 community too.
 7 So they're locales, so I think
 8 that he went with the initiative to do great
 9 things in Germany, but I don't think his head
 10 was really in the game because of what was
 11 happening.
 12 Q I understand. Thank you. Do you believe it
 13 might have helped in your opinion, or did the
 14 mayor ever tell you -- or in your opinion do
 15 you believe that there was ever -- did the
 16 mayor tell you -- I won't compound it.
 17 Did the mayor ever tell you that
 18 he felt that the city should release a short
 19 public statement correcting that bulk
 20 narrative? You stated that he told you he was
 21 concerned about Chad.
 22 Did he ever tell you about some
 23 ideas about releasing a statement?
 24 A To the public?
 25 Q Yes, just correcting the narrative.

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1 MR. BULIOX: Objection just as to
 2 form.
 3 Go ahead and answer if you can.
 4 THE WITNESS: I'm having trouble with
 5 that only because, right, he had a conversation
 6 with Maya Hilty about what happened. She had
 7 questions for him, and they had their meeting.
 8 So typically in my experience as
 9 communications, you'd be working with city
 10 administration to release something to the
 11 public, right, to address that issue, but I
 12 don't believe anything like that occurred.
 13 BY MS. DeMASTER:
 14 Q Did you ever go with the mayor to -- you
 15 mentioned there were city partners that you
 16 were concerned about and didn't want to work
 17 with Chad.
 18 Did you ever go with the mayor,
 19 ever talk to those city partners to be like
 20 hey, look, the city is not going to release
 21 anything but, look, it's not accurate or
 22 something?
 23 A I know that I had met with Deirdre from the
 24 Sheboygan County Chamber of Commerce. She's
 25 the executive director because she was my

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1 former employer. And because we worked
 2 directly with them as partners, she's
 3 definitely made the statements like what the
 4 hell is going on over there.
 5 And because of this narrative in
 6 the Sheboygan Press, right, she at first didn't
 7 know what to think about him. I'm like go back
 8 to all the times you worked with him. Of
 9 course he shouldn't have said it, but there are
 10 things to help members in our community to
 11 understand the implications of this and how
 12 this can really tear our community and entire
 13 organization apart.
 14 But then I shared with her and
 15 was very explicit as to what was going on,
 16 right, that this had gotten to a group, right,
 17 and now all sorts of perceptions and feelings
 18 and emotions are being just thrown out there,
 19 and this is just -- I can tell you -- I told
 20 her I can tell you what happened from my
 21 understanding and then what you're saying in
 22 all of the media.
 23 If I was just a Sheboygan
 24 resident that read what I read in the media, I
 25 would think that Chad was a racist member of

1 mediator -- it's in management, some sort of --
2 I'm trying to think of what the firm was
3 called. They were brought in to help us manage
4 this, manage employee dysfunctionality, all of
5 that work has stopped too that a lot of
6 employees have asked us about.

7 We find it difficult to just
8 answer. It's new administration, so it's --
9 we're moving different objectives so...

10 Q How did you first learn about the racial slur
11 incident?

12 A I learned about it when Emily came into the
13 office and told me about that right then and
14 there.

15 Q What did Emily tell you?

16 A She told me she looked visibly upset,
17 emotional, and basically just said somebody
18 dropped an N bomb in the management meeting.
19 I'm like "Who"? She's on her phone and stuff,
20 and that's when she said it was Chad, and she's
21 like so I had to pull him aside after the
22 meeting and say hey, man, I know I asked what
23 was said, but you didn't have to say the N
24 word. You didn't have to say it. You could
25 have said the N word.

<p style="text-align: right;">Page 122</p> <p>1 offended?</p> <p>2 A Yeah.</p> <p>3 Q Why is that problematic to you?</p> <p>4 A It's extremely problematic because you're</p> <p>5 insinuating that some people may be offended by</p> <p>6 racial slurs and some people are not.</p> <p>7 It states that -- I have already</p> <p>8 said multiple times that people are -- members</p> <p>9 of the community are very taken back that a</p> <p>10 leader of a department that has been a member</p> <p>11 of the City of Sheboygan for 20-plus years uses</p> <p>12 a racial slur, and there's maybe ineffective</p> <p>13 transparency, communication. It's just the</p> <p>14 fact it was used.</p> <p>15 And now the lines are blurred</p> <p>16 with what's happening in headlines and how the</p> <p>17 racial slur was used in that meeting, right?</p> <p>18 It's going to be very different</p> <p>19 when somebody is saying to somebody you are</p> <p>20 this and this and this, or I was in a</p> <p>21 neighborhood meeting and a member in our</p> <p>22 community used a racial slur, and that is what</p> <p>23 we're trying to address here.</p> <p>24 Which, again, I will state I</p> <p>25 don't even know if the original root cause</p>	<p style="text-align: right;">Page 124</p> <p>1 A Yes. I think he would have. I can't think of</p> <p>2 a time where he said, no, you can't help me.</p> <p>3 And, again, that's kind of why I said we can</p> <p>4 see where there's communications -- there's</p> <p>5 support for communications and certain</p> <p>6 situations. So it would just be helpful if</p> <p>7 there was streamlined processes to support</p> <p>8 personnel with this process.</p> <p>9 Q Two more follow-ups. Warren was asking</p> <p>10 about -- you asked if anybody else was</p> <p>11 offended -- you heard from Emily that Judge</p> <p>12 Torrey was offended.</p> <p>13 You said -- were you talking</p> <p>14 about others within that meeting, or did you</p> <p>15 mean the community from the articles?</p> <p>16 A Just based off of all the commentary that I</p> <p>17 have seen on even our posts, yeah, people were</p> <p>18 offended that we still had --</p> <p>19 Q In the public?</p> <p>20 A Yes, that we still had a leader. Based off of</p> <p>21 their understanding what happened from reading</p> <p>22 those news articles, when you spoke to</p> <p>23 department heads who heard it right then and</p> <p>24 there, I don't want to speculate, but right</p> <p>25 there they didn't -- I never heard any</p>
<p style="text-align: right;">Page 123</p> <p>1 problem has ever been addressed to this day.</p> <p>2 MR. BULIOX: All right. Thank you</p> <p>3 very much.</p> <p>4 MS. DeMASTER: I have just a couple</p> <p>5 redirects from that.</p> <p>6 EXAMINATION</p> <p>7 BY MS. DeMASTER:</p> <p>8 Q In your opinion, if Todd or Chuck Adams,</p> <p>9 anybody at the city, any leadership had asked</p> <p>10 you to help coach Chad with writing an email</p> <p>11 apology, do you think Chad would have been</p> <p>12 receptive, or would he have told you to go</p> <p>13 away?</p> <p>14 MR. BULIOX: Objection. Calls for</p> <p>15 speculation.</p> <p>16 THE WITNESS: I would say no. I</p> <p>17 would definitely say he would have said, yeah,</p> <p>18 can you do it for me. He probably would have</p> <p>19 said can you help me.</p> <p>20 BY MS. DeMASTER:</p> <p>21 Q Clearly communications you're very skilled and</p> <p>22 Chad is not a social butterfly I think were</p> <p>23 your words?</p> <p>24 A Yeah.</p> <p>25 Q And he would have been receptive?</p>	<p style="text-align: right;">Page 125</p> <p>1 department head say he said it with intent to</p> <p>2 somebody or at somebody.</p> <p>3 Q One last thing. Have you ever heard the term</p> <p>4 "white man" or "white man of privilege"?</p> <p>5 A Yes.</p> <p>6 Q Have you heard it just in the context that</p> <p>7 white man -- was it -- is it offensive when a</p> <p>8 white man like Chad makes that comment?</p> <p>9 MR. BULIOX: So objection to the</p> <p>10 extent that it goes beyond the scope of my</p> <p>11 questioning.</p> <p>12 MS. DeMASTER: It goes to the DEI</p> <p>13 trainings -- or not maybe that -- or DEI</p> <p>14 conversations that they were having at the city</p> <p>15 before they have stopped recently.</p> <p>16 THE WITNESS: What was the question?</p> <p>17 BY MS. DeMASTER:</p> <p>18 Q Whether that was problematic if maybe Emily</p> <p>19 ever said anything to you or Amanda.</p> <p>20 A That what was problematic?</p> <p>21 Q That somebody like Chad who was a white man</p> <p>22 said that.</p> <p>23 MR. BULIOX: Objection. Form.</p> <p>24 Assumes facts not in evidence.</p> <p>25 Subject to that, go ahead and answer</p>

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1 if you can.

2 THE WITNESS: I'm sorry.

3 BY MS. DeMASTER:

4 Q You made a comment that Amanda apparently said

5 the word that when you were in Germany you

6 found this out?

7 A That Roberta Filicky-Peneski did?

8 Q That Roberta did. I'm sorry.

9 A Yeah.

10 Q So going back to during this time frame, was

11 anything said by Emily or Amanda, something

12 about why it was problematic that Chad said

13 that?

14 A Yes.

15 Q Do you remember what that was?

16 A Yes. I mean, it's a white male in a privileged

17 position allowed to use a racial slur.

18 Q Final question. Do you -- actually, no.

19 MS. DeMASTER: That was the final

20 question.

21 MR. BULIOX: I have a follow-up to

22 your follow-up.

23 EXAMINATION

24 BY MR. BULIOX:

25 Q To your knowledge, was Chad aware of your role

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1 in the city?

2 A Yes.

3 Q Was he aware of your role in communications?

4 A Yes.

5 Q And did Chad ever ask you to put together a

6 draft of an apology letter or communication for

7 him?

8 A No.

9 MR. BULIOX: No further questions.

10 Thank you.

11 MS. DeMASTER: We're good.

12 (Proceedings concluded at 12:56 p.m.)

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1 STATE OF WISCONSIN)

) SS:

2 COUNTY OF MILWAUKEE)

3

4 I, Dawn M. Lahti, RPR, CRR and Notary

5 Public in and for the State of Wisconsin, do

6 hereby certify that the preceding deposition

7 was recorded by me and reduced to writing under

8 my personal direction.

9 I further certify that I am not a

10 relative or employee or attorney or counsel of

11 any of the parties, or a relative or employee

12 of such attorney or counsel, or financially

13 interested directly or indirectly in this

14 action.

15 In witness whereof, I have hereunder

16 set my hand and affixed my seal of office on

17 this 17th day of July, 2024.

18

19

20

21

Dawn M. Lahti

DAWN M. LAHTI, RPR/CRR

Notary Public

In and for the State of Wisconsin

24

My commission expires April 16, 2028

25